

William N. Sinclair (SBN 222502)  
 (bsinclair@mdattorney.com)  
 Steven D. Silverman (Admitted *Pro Hac Vice*)  
 (ssilverman@mdattorney.com)  
 Stephen G. Grygiel  
 (sgrygiel@mdattorney.com)  
 Phillip J. Closius (Admitted *Pro Hac Vice*)  
 (pclosius@mdattorney.com)  
 Alexander Williams (Admitted *Pro Hac Vice*)  
 awilliams@mdattorney.com

**SILVERMAN|THOMPSON|SLUTKIN|WHITE|LLC**

201 N. Charles Street, Suite 2600  
 Baltimore, MD 21201  
 Telephone: (410) 385-2225  
 Facsimile: (410) 547-2432

Thomas J. Byrne (SBN 179984)  
 (tbyrne@nbolaw.com)  
 Mel T. Owens (SBN 226146)  
 (mowens@nbolaw.com)  
**NAMANNY BYRNE & OWENS, P.C.**  
 2 South Pointe Drive, Suite 245  
 Lake Forest, CA 92630  
 Telephone: (949) 452-0700  
 Facsimile: (949) 452-0707

Stuart A. Davidson (Admitted *Pro Hac Vice*)  
 (sdavidson@rgrdlaw.com)  
 Mark J. Dearman (Admitted *Pro Hac Vice*)  
 (mdearman@rgrdlaw.com)  
 Janine D. Arno (Admitted *Pro Hac Vice*)  
 (jarno@rgrdlaw.com)  
**ROBBINS GELLER RUDMAN  
 & DOWD LLP**  
 120 East Palmetto Park Road, Suite 500  
 Boca Raton, FL 33432  
 Telephone: (561) 750-3000  
 Facsimile: (561) 750-3364

Attorneys for Plaintiffs

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

ETIOPIA EVANS, as the Representative of the )  
 Estate of Charles Evans, et al., )  
 Plaintiffs, )  
 vs. )  
 ARIZONA CARDINALS FOOTBALL CLUB, )  
 LLC, et al., )  
 Defendants. )

Case No. 3:16-cv-01030-WHA

DECLARATION OF CHRIS GOODE TO  
 KEEP CERTAIN MATERIAL FILED BY  
 DEFENDANTS SEALED

1 I, CHRIS GOODE, do hereby declare as follows:

2 1. I am a plaintiff in this matter.

3 2. I submit this declaration in support of keeping confidential Exhibit 38, pages Goode  
4 827 and 833, filed as ECF No. 192 in support of ECF No. 190, the Clubs' Administrative Motion to  
5 File Under Seal Defendants' Motion to Dismiss the Second Amended Complaint and for Summary  
6 Judgment.

7 3. I have personal knowledge of the matters herein. If called as a witness I could and  
8 would competently testify as follows.

9 4. The pages set forth above identify the settlement amounts I received in a workers'  
10 compensation suit I filed against the Indianapolis Colts. While the settlement was not expressly kept  
11 confidential, no one other than the settling parties and their attorneys know of the amount that matter  
12 settled for (at least to my knowledge). Moreover, my personal financial information has no  
13 relevance to this matter, and particularly, to the motion at issue. Publication of the same would  
14 cause me unnecessary annoyance.

15 5. The pages identified above should remain under seal for the reasons articulated  
16 above.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed on this 27<sup>th</sup>  
18 day of March, 2017 at Birmingham, Alabama.

19 \_\_\_\_\_  
20 /s/  
Chris Goode

21 I, William N. Sinclair, counsel for Mr. Goode in this matter, hereby attest that I have on file a  
22 holographic signature corresponding to the signature indicated by the conformed signature (/s/)  
23 within this e-filed document.  
24  
25  
26  
27  
28